Supplemental Statement

OMB No. 1105-0002 Approval Expires Oct. 31, 1986 Pursuant to Section 2 of the Foreign Agents Registration Act

of 1938, as amended.

For Six Month P	eriod Ending		er 13, (Insert date)		
Name of Registrant Prather Seeger Doolit	ttle & Far	mer Regi	stration	No. 1815	;
Business Address of Registrant 1600 M Stree Washington,		36			
	I—REGIS	STRANT			
1. Has there been a change in the information pre-	viously furnis	hed in con	nection	with the follo	owing:
(a) If an individual:					
(1) Residence address(2) Citizenship(3) Occupation(b) If an organization:	Yes □ Yes □ Yes □	No 凶 No 凶 No 凶			
(1) Name(2) Ownership or control(3) Branch offices	Yes □ Yes □ Yes □	No (X) No (X) No (X)			
2. Explain fully all changes, if any, indicated in ite	m 1.				
IF THE REGISTRANT IS AN	N INDIVIDUAL,	OMIT RESPO	ONSE TO	ITEMS 3, 4, an	d 5.
3. Have any persons ceased acting as partners, office period? Yes □ No 🛣	ers, directors o	or similar of	fficials o	f the registra	nt during this 6 month reporting
If yes, furnish the following information: N/A					
Name	Position	3 3 3	6 PH 17	30LS/II	Date Connection Ended

4.	Have any persons Yes □ No □	become partners, officers, o	lirectors or similar officials	during this 6 mor	nth reporting period
	If yes, furnish the fo	llowing information: N/A			
	Name	Residence Address	Citizenship	Position	Date Assumed
5.	Yes LJ No L	ned in Item 4 rendered service N/A Such person and describe his		ne interests of any for	reign principal?
6.	Have any employees employment or conn If yes, furnish the for	or individuals other than officection with the registrant duri	ials, who have filed a short foing this 6 month reporting po	orm registration states eriod? Yes 💆	
	Name		ition or connection		Data tamusin na al
	Gloria J. Myer		sociate		Date terminated
7.	rendered services to	reporting period, have any persethe registrant directly in further lated or similar capacity?	ons been hired as employees of erance of the interests of any Yes \(\simeq \text{No \(\mathbb{N} \)	or in any other capacit foreign principal in c	y by the registrant who other than a clerical or
	If yes, furnish the fol	lowing information: n/a			
	Name	Residence Address	Positio connec	***	Date connection began

II-FOREIGN PRINCIPAL

(PAGE 3)

8.	Has your connection with any foreign prinicpal ended during this 6 month reporting period?	Ye	s 🔯	No □
	If yes, furnish the following information:			
	Name of foreign principal	1	Date of Ter	mination
	The Government of North Rhine Westphalia		5/13/88	
9.	Have you acquired any new foreign principal during this 6 month reporting period?	Yes □	No D	<u> </u>
	If yes, furnish following information: N/A			
	Name and address of foreign principal		Date	acquired
10.	In addition to those named in Items 8 and 9, if any, list the foreign principals whom you conti 6 month reporting period. The Federal Government of Nigeria The Royal Bank of Canada	inued to re	present du	aring the
	III-ACTIVITIES			
1.	During this 6 month reporting period, have you engaged in any activities for or rendered any senamed in Items 8, 9, and 10 of this statement? Yes ☒ No ☐	rvices to an	y foreign r	principal
	If yes, identify each such foreign principal and describe in full detail your activities and service	es:		
11	the Government of North Rhine Westphalia: Registrant has engaged in a cor rendered any services to principal which were not exempt under Second during this reporting period.	no activ ction 3(ities fo	or, he
1	he Federal Government of Nigeria: General legal representation on exther matters arising under domestic and international law, including n U.S. policies, identifying support for economic development in Nigerivate investment and expansion of the markets for Nigerian exports.	assessi	ne tran	ds ng

The Royal Bank of Canada: General legal representation relative to issues and concerns in the area of U.S.-Canadian banking relations generally and to principal's proposed application under § 4(c)(9) of the Bank Holding Company Act to retain Canadian government securities activities in the United States of Dominion Securities Corporation under the Canada-U.S. Free Trade Agreement.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12.	During this 6 n Yes ☑	nonth reporting po No □	eriod, have you on	behalf of any foreign p	orincipal engaged in po	olitical activity ² as defined b	elow?
	the relations, i	nterests and polic	cies sought to be in ed speeches, lectu	nfluenced and the me	ans employed to achie	, indicating, among other t eve this purpose. If the regi ls as to dates, places of de	strant
	See attach	ed sheets (5	pages).				
13.	In addition to t your foreign p		ed activities, if any Yes 🗆	, have you engaged in No 🏚	activity on your own b	oehalf which benefits any o	rall of
	If yes, describe	e fully. N/A					

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign political or with reference to the political or public interests, policies, or relations of a government or breign country or a foreign political party.

IV-FINANCIAL INFORMATION

14. (a) RECEIPTS—MON

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes \(\mathbb{\text{Y}}\) No \(\mathbb{\text{}}\)

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

Date	From Whom	Purpose	Amount
5/16/88	Royal Bank of Canada	fees & disbursements	\$ 2,192.11
5/23/88	Royal Bank of Canada	fees	9,255.00
6/6/88	Royal Bank of Canada	disbursements	1,413.43
6/28/88	Royal Bank of Canada	fees	5,000.00
8/1/88	Royal Bank of Canada	fees and disbursements	1,152.16
8/15/88	Royal Bank of Canada	fees & disbursements	2,280.88
9/30/88	Royal Bank of Canada	fees	5,000.00
11/4/88	Royal Bank of Canada	fees	5,610.00

Total \$31,903.58

(b) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes \(\sigma\) No \(\sigma\)

If yes, furnish the following information: N/A

Name of foreign principal

Date received

Description of thing of value

Purpose

A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

4Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

5. (a) DISBURS	SEMENTS-MUN	IES					
During thi	is 6 month rep	orting period, l	nave you				
(1) disbur	sed or expende	ed monies in co	nnection with activ	ity on behalf of a	ny foreign principal nam	ied in Items 8, 9 and 10	0
` '	atement?	Yes 🔀	No □				
(2) transm	nitted monies t	o any such for	eign principal?	Yes □	No 🛛		
If yes, set monies tra	forth below in ansmitted, if ar	the required d ny, to each fore	etail and separately ign principal.	for each foreign	n principal an account o	f such monies, includi	nį
Date		To	Whom		Purpose	Amo	ir
The Gove	rnment of N	orth Rhine	Westphalia				
Reportin	g period			tele	phone & teletrans	missions \$ 1.5	7
The Roya	1 Bank of C	anada					
	1			num1	lankdum f mudukdu.	~ 3/0 // 2	

15. (b) DISBURSEMENTS-THINGS OF VALUE

During this	6 mont	h reporting	period,	have you	dispose	d of any	thing c	of value ⁵	other t	han m	ioney i	n furthe	rance o	of or in
connection	with act	tivities on	behalf of	fany forc	eign prin	cipal na	med in	n items	8, 9 an	d 10 o	f this	stateme	nt?	
Yes □	No K													

If yes, furnish the following information: N/A

		Un behalf of	Description	
Date	Name of person	what foreign	of thing of	
disposed	to whom given	principal	value	Purpose

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No □

If yes, furnish the following information: continued on attached sheet.

Date	Amount or thing of value	Name of political organization	Name of candidate
6/2/88	\$ 1,000.00	Committee to Elect Senator Bentsen D.C. Dollars for Democrats Friends of Jim McDermott Frank Wolfe for Congress	Lloyd Bentsen
6/25/88	25.00		N/A
6/28/88	500.00		James McDermott
8/-/88	250.00		Frank Wolfe

(cont'd on one-page attachment.)

V-POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16.	During this 6 month	reporting period,	did you prepare,	, disseminate or cause to	be disseminated any	political propaganda as
	defined above?	Yes □	No 🔀			

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V. N/A

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18.	During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes \square No \square							
	If yes, identify each such fore	eign principal, specify amount,	and indicate for what pe	riod of time.				
19.	During this 6 month reportin propaganda include the use Radio or TV broadcasts	Magazine or newspaper	oreparing, disseminating					
	☐ Advertising campaigns	articles □ Press releases	☐ Pamphlets or other publications	Lectures or speeches				
	□ Other (specify)							
20.	following groups: Public Officials Legislators Government agencies		or associations	☐ Libraries ☐ Educational institutions ☐ Nationality groups	s			
21.	What language was used in t ☐ English	his political propaganda:	(specify)					
22.	Did you file v ith the Registra	tion Section, U.S. Department of e disseminated during this 6 n	of Justice, two copies of ea nonth reporting period?	ach item of political propaga Yes	anda material			
23.	Did you label each item of s Yes □ No □	uch political propaganda mater	ial with the statement re	equired by Section 4(b) of	the Act?			
 24.	Did you file with the Registra propaganda material as requ	ation Section, U.S. Department ired by Rule 401 under the Ac	of Justice, a Disseminati t? Yes □	on Report for each item of No □	such political			
		VI—EXHIBITS AN	D ATTACHMENTS					
25.	EXHIBITS A AND B							
	(a) Have you filed for each	of the newly acquired foreign p	rincipals in Item 9 the fo	ollowing:				
	Exhibit A ⁶ Yes Exhibit B ⁷ Yes	No □ No □						
	If no, please attach the r	equired exhibit. N/A						
	(b) Have there been any ch during this six month po	anges in the Exhibits A and B eriod? Yes □ I	previously filed for any f No 🛭	oreign principal whom you	ı represented			
	If yes, have you filed an	amendment to these exhibits?	N/A Yes □	No □				

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form RM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between

gistrant and the foreign principal.

26.	EXHIBIT C		
	If you have previously filed an Exhibit C ⁸ , state whether period. Yes □ No ☑	er any changes therein have occurred during this 6 month reporting	
	If yes, have you filed an amendment to the Exhibit C?	N/A Yes □ No □	
	If no, please attach the required amendment.		
27.	SHORT FORM REGISTRATION STATEMENT		
	Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No □		
	If no, list names of persons who have not filed the requ	nired statement. N/A	
acc	attached exhibits and that he is (they are) familiar with the curate to the best of his (their) knowledge and belief, exce	have) read the information set forth in this registration statement and the contents thereof and that such contents are in their entirety true and that the undersigned make(s) no representation as to the truth our Registration Statement, if any, insofar as such information is no	
		(Type or print name under each signature)	
(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar		Monosh Jame	
	tions who are in the United States, if the registrant is an organization.)	Thomas L. Farmer Ikm . D. Edward Wilson, Jr.	
		5, Bawara willows, 610	
		AN D.A	
	Subscribed and sworn to before me atWASHINGT	ON, D.C.	
thi	s 15th day of DECEMBER	, 19 <u>& &</u>	

Jeremiah R Kannon
(Signature of notary or other officer)
1.17 Commission Expires January 14, 1993

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

Yes. (Page 1 of 5 pages).

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Royal Bank of Canada

On behalf of principal, registrant has sought to keep in contact with U.S. officials involved in U.S.-Canadian Free Trade Agreement and retention of Canadian government securities activities in the United States of Dominion Securities Corporation relative to principal's application under § 4(c)(9) of the Bank Holding Company Act, as follows:

U.S. Department of the Treasury:

Jeanne S. Archibald, Deputy General Counsel, U.S. Department of the Treasury, 3308 MT, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 (11/8/88);

John G. Murphy, Jr., Senior Counsel for International Trade, U.S. Department of the Treasury, 2010 MT, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 re Free Trade Agreement (7/27/88);

Gregory Wilson, Deputy Assistant Treasury Secretary for Financial Institutions Policy, U.S. Department of the Treasury, 2326 MT, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 (11/8/88).

U.S. Senate:

John H. Chafee, U.S. Senate, SD-567, Dirksen Senate Office Building, Washington, DC 20510 (7/27/88).

The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Yes. (Page 2 of 5 pages).

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Federal Government of Nigeria

On behalf of principal, registrant has corresponded, met and spoken with U.S. officials of the Departments of State and Treasury, The White House, and with officials of Congress and the Office of the U.S. Trade Representative with regard to developing mutual cooperation between the two countries in the regulation of international drug traffic and in the identification and reduction of tariff and non-tariff trade barriers directly affecting relations between the two countries; has rendered advice relative to possible consultations and negotiation of a U.S. quota for Nigerian textiles, and relative to proposed amendments to the Trade Act of 1974 (H.R. 4848) and their implications for Nigerian economic development and expansion of Nigerian export markets and U.S.-trade relations generally, and relative to companion legislation introduced in the Senate and House of Representatives (H.R. 2148 and S. 1109) to amend the Federal Food, Drug and Cosmetic Act to require labelling as "saturated fat" certain tropical oils; has further rendered advice relative to negotiation of a bilateral fishing rights treaty governing the use of Nigerian waters by U.S. fishing vessels to ensure effective conservation and management of fisheries stocks and for the purposes of eradicating potential jurisdictional claims/disputes between the countries, and relative to a request initiating a Department of Commerce investigation of restraints on petroleum imports; and has assisted in arranging bilateral meetings between representatives of the U.S. and the Nigerian governments, as follows.

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Yes. (Page 3 of 5 pages).

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Federal Government of Nigeria (cont'd)

U.S. Department of State:

Frances D. Cook, Director, West African Affairs, U.S. Department of State, Room 4250, 2201 C Street, NW, Washington, DC 20520 re trade bill and economic meetings (7/19/88; 7/20; 8/31; 9/2; 9/19; 9/20; 10/28/88).

Donald V. Hester, Country Desk Officer, U.S. Department of State, Room 4250, 2201 C Street, NW, Washington, DC 20520 re trade bill (7/19/88; 7/20; 8/2; 9/7/88).

Robert Jackson, Assistant Desk Officer, U.S. Department of State, Room 4250, 2201 C Street, NW, Washington, DC 20520 re tropical oils, trade bill, drug enforcement, and economic meetings (7/13/88; 9/6; 9/16; 9/20; 9/27; 10/6; 10/11; 10/14; 10/17; 10/21/88).

Princeton Lyman, U.S. Ambassador to Nigeria, U.S. Department of State, 2201 C Street, NW, Washington, DC 20520 re trade bill (7/19/88; 7/20/88).

Robert A. Proctor, Country Desk Officer, U.S. Department of State, Room 4250, 2201 C Street, NW, Washington, DC 20520 re textiles and fishing (5/19/88; 7/1/88).

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Yes. (Page 4 of 5 pages).

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Federal Government of Nigeria (cont'd)

U.S. Department of the Treasury:

LoAnn Byers, Executive Assistant, Office of the Deputy Secretary, U.S. Department of the Treasury, 3326 MT, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 re economic meetings (9/22/88; 9/27/88).

Jill E. Kent, Assistant Secretary (Management) 3452 MT, Office of the Secretary, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 re economic meetings (10/6/88).

M. Peter McPherson, Deputy Secretary, U.S. Department of the Treasury, 3326 MT, 1500 Pennsylvania Avenue, NW, Washington, DC 20220 re economic meetings (9/20/88).

The White House:

John C. Tuck, Assistant to the President and Director of the Office of the Chief of Staff, The White House, Washington, DC 20500 re economic meetings (9/22/88; 10/5; 10/6/88).

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Yes. (Page 5 of 5 pages).

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Federal Government of Nigeria (cont'd)

Office of the U.S. Trade Representative:

Alan F. Holmer, Deputy U.S. Trade Representative (Washington), Office of the U.S. Trade Representative, Room 200, 600 Seventeenth Street, NW, Washington, DC 20506 re trade bill briefing for Africa delegation (7/22/88).

Marilyn Moore, Agricultural Division, GATT Affairs, Office of the U.S. Trade Representative, 600 Seventeenth Street, NW, Washington, DC 20506 re multilateral group on agricultural matters and meeting concerning import bans on foodstuffs (5/20/88; 5/23/88).

U.S. House of Representatives:

Eric Sildon, Legislative Aide to Rep. Dan Glickman, 1212 Longworth House Office Building, Washington, DC 20515-1604 re tropical oils bill/testimony (7/13/88; 7/16/88).

end of insert

The term 'political activities' means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulation, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

15(c). Disbursements -- Political Contributions

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes.

Date	Amount or thing of value	Name of political organization	Name of candidate
(cont'd) page	e 1 of 1-page attachment	:	
8/12/88 8/29/88 9/3/88	\$ 500.00 1,000.00	Jim McDermott for Congress Campaign '88	James McDermott Michael Dukakis
9/26/88 9/28/88	400.00 30.00 50.00	Committee for Tim Wirth, Inc. National Republican Party	Tim Wirth N/A
10/9/88 10/11/88	1,000.00 30.00	Republican Party of Virginia Lieberman for Senate 1988 Presidential Fund (Rep.)	N/A Joseph Lieberman N/A
10/13/88	200.00 300.00	George Bush for President Compliance Committee	George Bush
10/17/88	75.00	Friends of Congressman William Clinger Friends of Phil Sharp	William Clinger Phil Sharp
10/20/88 10/21/88	250.00 20.00	Reese Lindquist for Congress D.C. White House Victory	Reese Lindquist
10/27/88 11/1/88	100.00 25.00	Fund (Dem.) Chafee for Senate Upton '88 Committee	N/A John Chafee Fred Upton

Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

UNITED STATES DEPARTMENT OF JUSTICE REGISTRATION UNIT CRIMINAL DIVISION WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:
Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):
Yes or NoX
(If your answer to question 1 is "yes" do not answer question 2 of this form.)
2. Do you disseminate any material in connection with your registration:
Yes or NoX
(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)
Manus L. June, 12/ 15/88 Signature Date
Thomas L. Farmer Please type or print name of signatory on the line above
Partner